

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

Case No.: 22-cv-20712-RKA

PENINSULA PETROLEUM LIMITED,
Plaintiff,

v.

CI INTERNATIONAL FUELS LLC,
Defendant.

_____ /

**DEFENDANT’S MOTION FOR ENLARGEMENT OF TIME
TO FILE A RESPONSE TO PLAINTIFF’S AMENDED COMPLAINT**

Defendant, CI INTERNATIONAL FUELS LLC, (“CI”), respectfully submits this Motion for Enlargement of time to respond to Plaintiff’s Amended Complaint (DE 38), and in support thereof states as follows:

1. On November 8, 2022, Plaintiff’s verified Amended Complaint was filed (DE 38), making a response due on or before November 22, 2022.
2. The verified Amended Complaint raises three counts: Count I for Breach of Contract, Count II seeking Enforcement of Security Interest and Count III for Fraudulent Transfer.
3. On Monday, November 21, 2022, the undersigned counsel was retained by CI.
4. The undersigned counsel filed a Notice of Appearance (DE 39) and a Joint Motion for Substitution of Counsel (DE 40) immediately after being retained.
5. Counsel for CI has not had an adequate opportunity to discuss the Plaintiff’s claims with the Defendant or to review the record and evaluate Plaintiff’s claims and appropriate defenses. As such, counsel for CI respectfully requests that the Court grant it an additional 30 days from the date of the Court’s order to prepare a response.

6. By filing this Motion for an Enlargement of Time, Defendant, CI INTERNATIONAL FUELS LLC, does not waive any of its defenses, nor does it submit to jurisdiction or venue.
7. This request is not undertaken for purposes of delay and the Plaintiff will not be prejudiced by the granting the Defendant's Motion for Enlargement of Time to File a Response to Plaintiff's Amended Complaint. However, denying the motion will cause prejudice to the Defendant.

WHEREFORE, Defendant, CI INTERNATIONAL FUELS LLC, respectfully requests this Court enter an Order granting all appropriate relief, including a thirty (30) day enlargement of time for Defendant to file its responsive pleading and/or motion directed to Plaintiff's Amended Complaint, along with any other relief this Court deems just and proper.

Dated: November 21, 2022.

SANCHEZ VADILLO LLP

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By: /s/ Lori Dilican

Lori Dilican, Esq.

FBN: 1004723

LOCAL RULE 7.1(a)(3) CERTIFICATION

Undersigned counsel made reasonable efforts to confer with all parties or non-parties who may be affected by the relief sought in this motion via email and telephone on November 21, 2022, and conferred with counsel for Plaintiff, who opposes this motion.

By: /s/ Lori Dilican

Lori Dilican, Esq.

FBN: 100472

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 21, 2022, that I electronically filed the foregoing document via the Court's CM/ECF system, which will automatically serve a copy on all counsel of record.

By: /s/ Lori Dilican
Lori Dilican, Esq.
FBN: 1004723

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